

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE: : CASE NO. 19-13112
CHAPTER 13

PAULA J. MANNING : JUDGE BETH A. BUCHANAN

DEBTOR(S) : TRUSTEE'S OBJECTION
TO CONFIRMATION

Comes now the Chapter 13 Trustee, Margaret A. Burks and files this objection to the Plan filed by debtor(s). The Trustee objects for the reasons stated herein. Requested documents have not been provided.

- a) Resolve objection with Consumer Portfolio, Inc.
- b) File Amended Certificate of Service of Plan confirming method of service to Consumer Portfolio, Inc.
- c) Include funds (\$1,047.81) paid to Chase within preference period to Statement of Financial Affairs.
 - i. Amend Plan percent as affected.
- d) Amend Schedule G and Plan paragraph 5.1.6 to include Sprint.
- e) Provide proof of Uber insurance.
- f) Amend Means Test to include full amount received from mother's death benefits within six (6) months prior to filing.
- g) Amend Plan paragraph 12 to check box - all property of the estate to vest to Debtor upon confirmation.
- h) First Plan payment was due 09/23/2019 and every month thereafter. First payment has not been received.

The Trustee requests that the Court uphold her objection.

Respectfully submitted,

/s/ Margaret A. Burks, Esq.
Margaret A. Burks, Esq.
Chapter 13 Trustee
Attorney Reg. No. OH 0030377

Francis J. DiCesare, Esq.
Staff Attorney
Attorney Reg. No. OH 0038798

Tammy E. Stickley, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Chapter 13 Trustee's Objection to Plan Confirmation was served **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and by **ordinary U.S. Mail** on October 23, 2019 addressed to:

Paula J. Manning
debtor(s)
109 Fernald Drive
Harrison, OH 45030

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.

Francis J. DiCesare, Esq.

Tammy E. Stickley, Esq.

UNITED STATES BANKRUPTCY COURT
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IN RE: : CASE NO. 19-13112
 : CHAPTER 13
 PAULA J. MANNING : JUDGE BETH A. BUCHANAN
 :
 DEBTOR(S) :
 :
 : **NOTICE OF OBJECTION**
 : **TO CONFIRMATION**

The Chapter 13 Trustee, Margaret A. Burks, has filed an Objection to Confirmation of the Plan filed in the above-referenced case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in objection to confirmation, or if you want the court to consider your views on the objection, November 14, 2019, at the United States Bankruptcy Court, Atrium II, Suite 800, 221 East 4th Street, Cincinnati, Ohio 45202.

You may also file a Response explaining your position.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it before the confirmation hearing.

If you file a Response, you must also mail a copy to:

Margaret A. Burks
Chapter 13 Trustee
600 Vine Street
Suite 2200
Cincinnati, Ohio 45202

U.S. Trustee
J.W. Peck Federal Building
550 Main Street, Room 4-812
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the objection and may enter an order granting that relief.

Date: October 23, 2019

/s/Margaret A. Burks, Esq.
Margaret A. Burks, Esq.